



Infrastructure · Water · Environment · Buildings

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Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3 Progress Report (April 2013)

ENVIRONMENT

Dear Mr. Krawczyk:

Date:

May 13, 2013

On behalf of Georgia-Pacific LLC (Georgia-Pacific), attached is the April 2013 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent (AOC) for the Remedial Design/ Remedial Action at the KHL OU, as was fully executed on February 8, 2000. Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, reports documenting operation, maintenance, and monitoring activities shall be submitted pursuant to the schedule set forth in the Operation and Maintenance Plan.

Contact:

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Our ref:

B0064583.0004.00675
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If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC
Daria Devantier, Michigan Department of Environmental Quality
Michael Berkoff, USEPA Region 5
Dawn Penniman, P.E., ARCADIS

**PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
KING HIGHWAY LANDFILL OPERABLE UNIT 3**

APRIL 2013

PREPARED MAY 13, 2013

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**KEITH KRAWCZYK, PROJECT COORDINATOR
REMEDATION AND REDEVELOPMENT DIVISION**

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
April 2013 Monthly Progress Report**

Remedial Activities

- On April 5, ARCADIS submitted to Michigan Department of Environmental Quality (MDEQ) the March 2013 Monthly Progress Report.
- On April 8, ARCADIS forwarded the electronic version of the March 13, 2013 Investigation Plan for Off-Site Landfill Gas Migration at the King Highway Landfill to MDEQ (Landfill Gas Investigation Plan).
- On April 11, MDEQ held an internal meeting with the MDEQ Superfund Review Team (SRT) to review the completion of construction of the remedy at the KHL OU, at the conclusion of which, approval was provided for staff to prepare a letter indicating certification of construction completion. This decision was communicated to Georgia-Pacific on April 12.
- On April 12, Georgia-Pacific received draft documents constituting the Restrictive Covenant for the KHL OU from the Michigan Department of Attorney General.
- On April 16, Georgia-Pacific and MDEQ participated in a call to discuss the remaining items required before issuing the certification of construction completion for the KHL OU.
- On April 16, MDEQ held an internal meeting with the MDEQ SRT to review the various documents constituting the Restrictive Covenant for the KHL OU and the easements associated with the KHL OU properties.
- On April 16, MDEQ provided the United States Environmental Protection Agency (USEPA) with an update on the status of the recent MDEQ SRT meetings and closeout of the AOC for the KHL OU.
- On April 17, Georgia-Pacific transmitted to MDEQ an email regarding the certification of construction completion and draft Restrictive Covenant documents.
- On April 18, MDEQ notified Georgia-Pacific that a letter would be issued providing two comments on the DRAFT FINAL *Operation and Maintenance Plan* (O&M Plan) and approval of the Landfill Gas Investigation Plan; and requested that Georgia-Pacific submit all data used in developing the Flow Reversal Determination Technical Memorandum.
- On April 23, MDEQ issued a letter indicating that its review of the DRAFT FINAL *Report for Completion of Construction* (Completion Report) and O&M Plan had concluded; and providing contingent approval of the Landfill Gas Investigation Plan and the Flow Reversal Determination Technical Memorandum.
- On April 24, ARCADIS requested clarification from MDEQ on a comment included in the April 23, 2013 Letter regarding missing information associated with the data spreadsheet used in development of the Flow Reversal Determination Technical Memorandum, which was submitted to MDEQ on April 22.

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
April 2013 Monthly Progress Report**

Operation, Maintenance, and Monitoring Activities

- On April 3, MDEQ contacted ARCADIS to discuss the Landfill Gas Investigation Plan submitted to MDEQ on March 13, 2013.
- On April 8, ARCAIS contacted MDEQ regarding the potential for the existing 72-inch diameter sanitary sewer line located along the western side of the KHL to be a conduit for the off-site migration of landfill gas.
- On April 23, MDEQ provided their approval of the Landfill Gas Investigation Plan in aforementioned letter issued by MDEQ.

Upcoming Activities

- In May, Georgia-Pacific anticipates submitting "FINAL" versions of the Completion Report and O&M Plan to MDEQ for approval.
- In May, Georgia-Pacific anticipates that the Restrictive Covenant and associated easements and access agreements will be finalized.
- In May, Georgia-Pacific will implement the MDEQ-approved Investigation Plan. Immediately following installation of the additional gas probes, ARCADIS will perform the 2013 2nd quarter landfill gas monitoring event and 2013 semi-annual landfill inspection, prior to which, MDEQ will be notified of the schedule for completing these activities at least 10 days in advance of performing the events.